VIA ELECTRONIC FILING AND OVERNIGHT DELIVERY

Mary L. Cottrell, Secretary
MA Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: <u>D.T.E. 04-116, Investigation into Service Quality Guidelines</u>

Dear Ms. Cottrell:

Enclosed for filing, please find Bay State Gas Company's ("Bay State" or "Company") responses to the Massachusetts Department of Telecommunications and Energy's ("Department") information requests DTE-A 3-1 through DTE-A 3-2 issued in the above-referenced docket. The Company is filing these responses out of time due to an administrative oversight. We apologize for any confusion this may have caused.

Please feel free to contact me at (508) 836-7254 should you have any questions concerning this filing.

Sincerely,

Thomas R. Birmingham Manager, Regulatory Policy

cc: Jody M. Stiefel, Hearing Officer
Colleen McConnell, Assistant Attorney General
Service List

COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE THIRD SET OF INFORMATION REQUESTS FROM THE D.T.E. TO ALL PARTICIPANTS

D.T.E. 04-116

Date: August 4, 2005

Witness Responsible: Thomas R. Birmingham

DTE-A 3-1: Please provide, for all gas and electric companies in the United States with a telephone answering performance measure, a description of the measure, the name of the company, and the docket or other citation where the measure was adopted.

RESPONSE: Attached please find the following information:

- a) Attachment DTE-A 3-1 (a) is "Appendix 1 States Requiring Reporting on Service-quality Measures Similar to those Adopted by the DTE" to the report prepared by Navigant Consulting entitled <u>Summary of Findings Related to Service-Quality Benchmarking</u> <u>Efforts</u> – jointly filed with the DTE on December 31, 2002, in Docket DTE 99-84 by various electric and gas utilities. This summary page indicates which states require a telephone answering performance measure. According to this report, there are 19 states that require this measure.
- b) Attachment DTE-A 3-1 (b) is "Schedule 13 Industry Benchmarks Appendix" – a summary of Industry Benchmarks identified and included in the <u>Management Audit and Investigation of Service Quality Incentive Plan Report</u> prepared by KEMA-XENERGY for the Maine Public Utilities Commission in its investigation on Northern Utilities in Docket 2002-140. This summary provides a listing of various utilities that have a telephone answering performance measure and the measure benchmark.
- c) Attachment DTE-A 3-1 (c) is Northern Utilities, Inc. Maine Division's description of the telephone answering performance measure, as defined in the Settlement Agreement approved by the Maine PUC on March 17, 2004 in Docket No. 2002-140.
- d) Attachment DTE-A 3-1 (d) is Northern Utilities, Inc. NH Division's description of the telephone answering performance measure, as defined in the Settlement approved by the NHPUC on October 28, 2002 in Docket No. DG 01-182.
- e) Attachment DTE-A 3-1 (e) is a summary of requirements other NiSource affiliates have regarding telephone answering performance measures.

Appendix 1

States Requiring Reporting on Service-quality Measures Similar to those Adopted by the DTE

					On Cycle Meter	Telephone Response	Service	Worker Lost	Customer Complaint
ID	State	SAIFI	SAIDI	Odor Response	Reading	Time	Appointments	Time	Tracking
AL	Alabama							✓	✓
AR	Arkansas	✓	✓					✓	
AS	Alaska							✓	
AZ	Arizona							✓	✓
CA	California	✓	✓					✓	✓
∞	Colorado	✓	✓			✓		✓	✓
CT	Connecticut	✓	✓					✓	✓
DC	District of Columbia							✓	
DE	Delaware					✓	✓	✓	
FL	Florida	✓	✓					✓	✓
GA	Georgia							✓	
Н	Havaii					✓		✓	
IA	lova	✓	✓					✓	
ID	Idaho (PACIFICORPonly)	√	✓			✓		✓	
IL	Illinois	✓	✓	✓				✓	
IN	Indiana	✓	✓			✓		1	
KS	Kansas (KOPL & WESTAR)	✓	✓	✓		✓		✓	✓
KY	Kentucky	✓	✓					✓	
LA	Louisiana	✓	✓					✓	✓
MA	Massachusetts	✓	✓	✓	✓	✓	✓	✓	✓
MD	Maryland	√	✓					1	
ME	Maine	√						1	✓
M	Mchigan				✓	✓		✓	✓
MN	Mnnesota	√	✓		✓	✓	✓	1	✓
MO	Mssouri							1	✓
MS	Mssissippi	√	✓					✓	
MT	Montana							1	
NC	North Carolina	✓	✓	✓		✓		1	
ND	North Dakota	√	✓					1	✓
NE	Nebraska							1	
NH	New Hampshire	√	✓	✓		✓		1	
NJ	NewJersey							1	
NM	New Mexico							1	
NV	Nevada	✓	✓					1	
NY	NewYork	✓			✓	✓	✓	1	✓
ОH	Chio	√	✓			✓		✓	✓
OK	Oklahoma							✓	
OR	Cregon	✓	✓					✓	✓
PA	Pennsylvania	✓	✓			✓		1	✓
RI	Rhode Island	✓	✓			✓			
SC	South Carolina							✓	
SD	South Dakota							1	
TN	Tennessee							1	
TX	Texas	✓	✓					1	
UT	Utah	√	✓	✓		✓	✓	1	✓
VA	Virginia		✓					1	
VT	Vermont	✓			✓	✓	✓	✓	✓
WA	Washington	√	✓	✓		✓	✓	1	✓
W	Wisconsin	✓	✓			✓		✓	
W	West Virginia							✓	✓
WY	Wyoming							1	
	Total	31	29	7	5	19	7	50	22
L	i out	JI	43	'	อ	17		JU	~

Appendix 2

Service-quality Standards for States With Performance Based Rates

- California San Diego Gas & Electric and Southern California Edison each have PBR plans that include penalties and rewards for SAIDI, employee safety, and customer satisfaction. The performance targets have shifted over time.
- Colorado XCEL Energy must achieve certain performance standards for calls answered (within 45 seconds), customer satisfaction, and SAIDI.
- **Delaware** Service-quality standards imposed from the Pepco/Conectiv merger and consolidated resolutions of other outstanding cases includes answering 80% of calls within 30 seconds, a 5% call abandonment rate ceiling, and handling 95% of all calls by a human or IVR contact. It also includes customer service guarantees that carry customer payment fees: (1) a four-hour window for appointments (\$25), and (2) accurate bills (\$5).
- Kansas The OneOK/Western Resources gas property merger resulted in standards and penalties for Kansas Gas Services, including call center performance and response time to odor calls.
- **Minnesota** The Public Utilities Commission recently imposed specific service-quality standards for reliability and customer service to XCEL Energy's Minnesota jurisdiction in conjunction with a merger agreement.
- New York Each of the major utilities must achieve individual and different sets of performance standards and measures.
- North Carolina The regulator imposed certain service expectations on North Carolina natural Gas after its merger with Carolina Progress, and on Public Service of North Carolina after its merger with SCANA. These included response times to leak calls (18 minutes and 19.4 minutes, respectively), call abandonment rates under 4%, and call answering times of 20 seconds for 83% of the calls.
- North Dakota Both Otter Tail and NSP have PBR programs that require certain levels of service-quality and performance including 25 basis point penalties and rewards for CAIDI, SAIDI, SAIFI, (with dead bands), employee safety (dead band around NCEA utility group), customer satisfaction (with a dead band), and price (benchmarked to regional prices).
- Rhode Island NEES/EUA merger settlement agreement includes performance standards for SAIDI, SAIFI, customer satisfaction, and calls answered within 20 seconds.
- **Utah** The Pacificorp/Scottish Power merger led to the imposition of 8 customer service guarantees, including resolving billing problems within 10 days, keeping appointments, and providing 2 days notice for planned interruptions. If not met, the company pays up to \$100 to affected customers. Performance standards include

answering 80% of telephone calls within 20 seconds, responding to all complaints within 3 days, improving worst performing circuits over a two-year period, and improving SAIDI and SAIFI by 10% by 2005.

- **Vermont** The Department of Public Service established reliability and customer service-quality standards and reporting in rate orders for Green Mountain Power and Central Vermont Public Service, the 2 largest utilities in the state; performance standards will follow shortly for other utilities.
- Washington –Mergers resulting in Puget Sound Energy (Puget Power and Washington Natural) and Pacificorp/ScottishPower resulted in two very different PBRs. PSE has a Service-quality Index and reports on 10 benchmarks, including SAIDI, SAIFI, telephone answering, gas safety response, appointments, and customer satisfaction. Pacificorp reports on CAIDI, SAIFI, MAIFI, telephone response, and complaint resolution.

9.13 SCHEDULE 13 - INDUSTRY BENCHMARKS APPENDIX

Average Speed	l of Answer –			
Emergency Ca	<u>ılls</u>			
New York	Brooklyn Union Gas	80.0% to 85.6% of calls within 20 seconds		
California	Southern California Gas	90% of calls within 20 seconds		
Massachusetts	Boston Gas	95% of calls within 30 seconds		
Massachusetts	Bay State Gas	95% of calls within 30 seconds		
New Hampshire Northern Utilities		90% of calls within 30 seconds		
Average Speed	l of Answer –			
General Calls				
New York	Brooklyn Union Gas	55.1% to 73.2% of calls within 45 seconds		
New York	National Fuel Gas	72.0% to 74.0% of calls within 30 seconds		
New York	Rochester Gas & Electric	73.0% of calls within 30 seconds		
California	Southern California Gas	80% of calls within 60 seconds		
California	San Diego Gas	80% of calls within 60 seconds		
Massachusetts	Boston Gas	80% of calls within 30 seconds		
Massachusetts	Bay State Gas	80% of calls within 30 seconds		
Maine	Central Maine	80% of calls within 30 seconds		
Maine	Bangor Hydro	80% of calls within 30 seconds		
Delaware	Pepco/ Conectiv	80% of calls within 30 seconds		
North Carolina	North Carolina Gas	83% of calls within 20 seconds		
Utah	Pacificorp	80% of calls within 20 seconds		
Vermont	Vermont Gas	60% to 70% of calls within 30 seconds		
New Hampshire	Northern Utilities	80% of calls within 30 seconds		
Abandoned Ca	all Rate			
New York	Brooklyn Union Gas	Maximum of 3.5% of calls abandoned		
New York	Consolidated Edison	Maximum of 2.6% - 5.1% of calls abandoned		
Delaware	Pepco/ Conectiv	Maximum of 5.0% of calls abandoned		
North Carolina	North Carolina Gas	Maximum of 4.0% of calls abandoned		
Vermont	Vermont Gas	Maximum of 5.0% to 6.0% of calls abandoned		
Missouri	Missouri Gas	Maximum of 8.5% of calls abandoned		

(Selected portions of Settlement)

Attachment Settlement - SQP - 2

SERVICE QUALITY PERFORMANCE PLAN

I. **GENERAL**

A. Provisions

The following guidelines apply to the Maine Division of Northern Utilities, Inc. ("Northern" or "the Company"), unless otherwise indicated.

B. Definitions

"Abandoned Call" -- calls entering any of the Contact Center queues that are ultimately abandoned by either the caller or the Company.

"Annual" – on a calendar year basis.

"Busy Outs" - a caller reaching the Springfield Contact Center who experiences either a fast busy signal or a recording stating that all incoming circuits are busy and to call back later-.

"CAD" – Consumer Assistance Division of the Commission.

"Class I Odor Call" -- those calls that relate to a strong odor of gas throughout a household or outdoor area, or a severe odor from a particular area.

"Class II Odor Call" -- calls involving an occasional or slight odor at an appliance.

"Company" -- Northern.

"Company Meter Read" – whenever the Company obtains an actual consultation of the meter, whether through a manual or automatic reading method.

"Commission" - the Public Utilities Commission of the State of Maine.

"Consumer Assistance Division Case" or "CAD Case" -- a written record opened by the CAD in response to a Customer complaint that meets the criteria set forth in Section II.E.1.

"Contact Center" – the Company's Springfield Contact Center.

"Contact Center Network Busy Outs" -- calls entering the Company's enhanced call routing switch that either receive a busy signal or are otherwise unable to be processed into the integrated voice response system.

"Customer" – an active residential or non-residential consumer of Northern's natural gas distribution service who received utility service, or has agreed to be billed for utility service, during the Reporting Period.

"Customer Satisfaction Survey" – a statistically reliable telephone survey conducted on behalf of the Company by a third-party vendor of Customers who recently received a Utility or Regulated Service Activity to determine the level of satisfaction after receiving the requested service.

"Customer Meter Read" – when the Customer provides Northern with usage information as displayed on the Company's meter.

"Dispatch Center" – the Company's Brockton Dispatch Center.

"Emergency Call" -- a telephone call entering and received by the Company's gas leak line located at the Dispatch Center where the caller believes that he or she is confronting a special circumstance that leads the caller to believe that such circumstance might lead to bodily and/or system-related damage if the circumstance is not addressed. Examples of such circumstance include reports of gas leaks and gas odors.

"Long No Read" -- any meter that has not had a Company Meter Read for a period of at least 12 consecutive months or longer.

"Maximum Penalty" – The maximum financial penalty the Company is subject to paying in any given Year is \$300,000.

"Monthly" – for the period of the first day of the month to the last day of the month unless otherwise noted.

"Meter Reads Used" -- Company Meter Reads that are used by Northern for billing purposes.

"Network Call" – a call entering the Company's Contact Center telephone network (i.e., Enhanced Call Routing switch).

"Non-Emergency Call" -- all telephone calls received by the Contact Center other than Emergency Calls.

"On-Cycle Meter Reading" -- the act of manually or automatically acquiring Customer-specific usage levels, expressed in numerical units, during a normal on-cycle period.

"Operating Area" -- the geographical territory in Maine that is served by Northern and is defined in Northern's Tariff. These areas may also be referred to as regions, divisions, or districts.

"Quarterly" – the three month periods ending March 31, June 30, September 30, and December 31, respectively.

"Reporting Period" – The twelve-month period ending December 31 of any given year.

"Respond" or "Response" to a Class I or Class II Odor Call shall mean the following: from the time the Dispatch Center answers the Emergency Call to the on-site arrival of the qualified Company personnel who is able to make the situation safe.

"Service Appointment" -- a mutually agreed-upon arrangement for service between the Company and the Customer that specifies the date and time (e.g., AM, PM, or All Day) for the Company's personnel to perform a Utility or Regulated Service Activity that requires the presence of the Customer at the time of service.

"Service Quality Performance Measures" – those measures provided in Section II of this Service Quality Plan.

"TSF" – Telephone Service Factor. Measures performance in customer service response at the Contact Center and Dispatch Center.

"Utility" or "Regulated Service Activity" — the following activities performed by Northern: meter turn on and turn offs, meter exchanges and tests, new service installations, connection and reconnection services, and disconnections.

"Year" -- calendar year unless otherwise noted.

D. CONTACT CENTER PERFORMANCE MEASURES

1. Telephone Service Factor – Emergency Calls

a. Baseline Performance Target

Northern shall answer at least 95 percent of all Emergency Calls within 30 seconds.

b. Reporting Requirements

Northern shall gather data and report statistics on its ability to answer Emergency Calls. Emergency Call data shall be compiled and aggregated Monthly. Reporting shall occur on an Annual Basis. Each report shall be submitted in accordance with Section IV.A, below, with data rounded to the nearest whole percentage point.

c. Performance Formula

% Calls Answered ≤ 30 Seconds = A / B

Where: A = Total # of Calls Answered In \leq 30 Seconds

B = Total # of Calls Offered

A. Total # of Calls Answered in ≤ 30 Seconds = Total # of Calls
 Answered ≤ 30 Seconds + Total # of Calls Abandoned ≤ 30
 Seconds

B. Total # of Calls Offered = Total # of Calls Entering Brockton
Dispatch Center's PBX

Total # of Calls Entering PBX = Sum Of Calls From Following 4 Numbers:

- Brockton (800) 525-8222
- Lawrence (978) 687-0259
- Springfield (800) 792-2444
- ME & NH (800) 842-6847

Telephone Service Factor ("TSF") for Emergency Calls shall be measured beginning at the point that the caller's call is offered to the Company's Brockton Dispatch Center's PBX/Symposium System and ending at the point that the call is responded to by the Company's Dispatch Center personnel.

2. Telephone Service Factor – Non-Emergency Calls

a. Baseline Performance Target

Northern shall answer at least 75 percent of all Non-Emergency Calls by a live Customer Service Representative ("CSR") within 30 seconds.

b. Reporting Requirements

Northern shall gather data and report statistics on its handling of Non-Emergency Calls. Non-Emergency Call data shall be compiled and aggregated Monthly. Reporting shall occur on an Annual basis. Each report shall be submitted in accordance with Section IV.A, below, with data rounded to the nearest whole percentage point.

c. Performance Formula

% Calls Answered ≤ 30 Seconds = A / B

Where: A = Total # of Calls Answered by a live CSR In \leq 30

Seconds

B = Total # of Call Answered by a live CSR

- A. Total # of Calls Answered by a live CSR In ≤ 30 Seconds = Total # of Calls Answered by a live CSR ≤ 30 Seconds + Total # of Calls Abandoned ≤ 30 Seconds
- B. Total # of Calls Answered by a live CSR = C + D
- C. Total # of Calls Answered by a live CSR in QUEUE $1 4^{1}$
- D. Total # of Calls Abandoned in QUEUE 1 4

Telephone Service Factor ("TSF") for Non-Emergency Calls shall be measured beginning at the point that the caller chooses to speak to a CSR and ending at the point that the call is responded to by the service-area CSR selected by the caller. If the caller does not make any selection, the response time shall be measured from a point following the completion of the Company's recorded menu options and ending at the point that a CSR responds to the call.

In addition, the Company agrees to ensure that: (1) each menu level of the Contact Center's integrated voice response ("IVR") system provides the explicit option for customers to reach a live customer service representative ("Option 0"), and (2) the IVR's Main Menu will provide Option 0 in a timely manner within the first 4 menu options.

3. Abandoned Call Rate

a. Baseline Performance Target

Northern shall abandon no more than 5 percent of all calls reaching any of the Springfield Contact Center's four queues.

b. Reporting Requirements

Northern shall gather data and report statistics for the percent of calls entering any of the Contact Center queues that are ultimately abandoned by either the caller or the Company. Abandoned Call data shall be compiled and aggregated Monthly. Reporting shall occur on an Annual basis. Each report shall be submitted in accordance with Section IV.A, below, with data rounded to the nearest whole percentage point.

c. Performance Formula

% of Abandoned Calls = A / B

Where:

Queue 1 = Billing, Queue 2 = Service, Queue 3 = Credit MA, and Queue 4 = Credit ME/NH.

A = Total # of Abandoned Calls

B = Total # of Calls Answered

- A. The Total # of Abandoned Calls is captured by adding all calls abandoned upon entering the Springfield Contact Center's QUEUES $1 4^2$
- B. Total # of Calls Answered = C + D.
- C = Total # of Calls Answered upon entering the Springfield Contact Center's QUEUE 1 4
- D = Total # of Calls Abandoned upon entering the Springfield Contact Center's QUEUE 1 4

4. Contact Center Network Busy Outs

a. Baseline Performance Target

Northern shall allow no more than 2 percent of all Network Calls reaching the Springfield Contact Center to incur a Busy Out.

b. Reporting Requirements

Northern shall gather data and report statistics for the percent of Network Calls entering the Company's network (i.e., Enhanced Call Routing switch) that either receive a Busy Out or are otherwise unable to be processed into the Integrated Voice Response system. Contact Center Network Busy Out data shall be compiled and aggregated Monthly. Reporting shall occur on an Annual basis. The reports shall be submitted in accordance with Section IV.A, below, with data rounded to the nearest whole percentage point.

c. Performance Formula

% of Contact Center Network Busy Outs = A / B

Where:

A = Total # of Network Busy Outs

B = Total # of Network Calls

² Queue 1 = Billing, Queue 2 = Service, Queue 3 = Credit MA, and Queue 4 = Credit ME/NH.

- A. The Total # of Network Busy Outs = Total # of Network Calls coming into the Springfield Contact Center's Enhanced Call Routing switch that experience either a fast busy signal or a recording stating that all incoming circuits are busy and to call back later.
- B. Total # of Network Calls = (A + C + D)
- C = Total # of Network Calls Answered
- D = Total # of Network Calls Abandoned
- C. Total # of Network Calls Answered = all telephone calls coming into the Springfield Contact Center from the following 6 lines:

Massachusetts 800 #s:

5052 – Service

5454 – Billing

6160 - Credit

Maine and New Hampshire 800 #s:

8464 – Service

3043 – Billing

3044 - Credit

D. Total # of Network Calls Abandoned = # of Network Calls
Abandoned Due To No Answer + # of Network Calls Abandoned
By Originator + # of Network Calls Abandoned By Destination.

All Network Call data is provided by the Company's telephone vendor.

STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

Docket DG 01-182, Northern Utilities, Inc.

Settlement Agreement

B. Customer Service

The Parties and Staff agree that Northern will work to improve its service quality in the areas of billing, meter reading and call center operations. To that end, Northern agrees to the following performance goals for its New Hampshire customers:

- 1) 80 percent of all calls in any given month to the billing, service or credit lines be answered within 30 seconds. The thirty-second call answering period will be measured beginning at the point where an incoming call enters the queue for answering by a call center representative. Calls handled by Northern's interactive voice response ("IVR") system shall be considered to be answered in zero seconds.
- 2) 90 percent of emergency calls received in any given month be answered within 30 seconds. Measurement of Northern's call answering performance will be determined in the same manner as for measure 1, above.
- 3) No more than 2 percent of all calls, measured quarterly, to call center, or any other service center with the responsibility for responding to customer calls, shall encounter a busy signal or other busy indication.

Northern agrees to make test calls to its IVR on a daily basis to monitor the functionality of the IVR system. Northern agrees to notify the Commission's Consumer Affairs Division of any IVR malfunctions that affect customers. Northern further agrees to implement a new IVR system by November 1, 2003. Northern will work with the Parties and Staff in developing its new IVR system.

In addition to the above established performance goals, Northern shall also report its monthly average speed of answer for its billing, credit and service lines, its monthly number of calls abandoned and its monthly average time to abandon.

NiSource Telephone Answering Performance Requirements

The following table includes information on standards that have been imposed on the NiSource by its various state utility commissions or other governing bodies.

State	Service Level	ASA	Abandon Rate	Comments
IN	No current standard	For reporting purposes only	For reporting purposes only	A rolling 12-month weighted average for Contact Center ASA and Abandonment rate are reported.
KY	84 / 20	20 sec.	Less than or equal to 4%	
ME Customer Service	75 / 30	No current standard	Less than 5%	The service level looks at the aggregate performance of the three existing Customer Service lines (Billing, Credit & Service), but excludes calls handled by the IVR.
MA Customer Service	69.3 / 30	No current standard	No current standard	The Service Level looks at the aggregate performance of the three existing Customer Service lines (Billing, Credit & Service) and includes calls answered by the IVR as answered in zero seconds.
NH Customer Service	80 / 30	For reporting purposes only	For reporting purposes only	The Service Level looks at the aggregate performance of the three existing Customer Service Lines (Billing, Credit & Service) and includes calls answered by the IVR as answered in zero seconds.
MD	No current standard	No current standard	No current standard	
PA	80 / 30 For reporting purposes only	No current standard	For reporting purposes only	Percent of calls answered within 30 seconds (IVR included), abandonment % and busy-out percentages are reported monthly to the PA PUC Bureau of Consumer Services
VA	No current standard	120 sec*	No current standard	* During 2001 when increases in rates and call volumes were experienced, VA commission expected a 120 second ASA. This has since passed and there are currently no official CC performance standards.
ОН	No current standard	120 sec*	No current standard	* Unofficially, a 120 second ASA evolved from the utility commission 3 years ago. No formal or legal agreement currently exists. From approximately Jan 2001 through Jan 2002, monthly ASA and Forced Disconnects had to be reported to PUCO.
ME	95 / 30	No current		
Emergency MA	96.8 / 30	standard No current		
Emergency		standard		
NH Emergency	90 / 30	No current standard		

COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE THIRD SET OF INFORMATION REQUESTS FROM THE D.T.E. TO ALL PARTICIPANTS

D.T.E. 04-116

Date: August 4, 2005

Witness Responsible: Thomas R. Birmingham

- DTE-A 3-2: Please discuss the feasibility of adopting a telephone answering performance measure described below:
 - (a) Eighty percent of telephone calls answered within 30 seconds, as defined by a customer receiving and selecting between the option to receive automated information (e.g., account balance) and speaking with a customer service representative;
 - (b) Eighty percent of telephone calls answered within 40 seconds, with the same parameters as in (a);
 - (c) Eighty percent of telephone calls answered within 60 seconds, with the same parameters as in (a);
 - (d) Seventy-five percent of telephone calls answered within 30 seconds, with the same parameters as in (a);
 - (e) Seventy-five percent of telephone calls answered within 40 seconds, with the same parameters as in (a);
 - (f) Seventy-five percent of telephone calls answered within 60 seconds, with the same parameters as in (a);
 - (g) Seventy-five percent of telephone calls answered within 20 seconds, with the same parameters as in (a).

RESPONSE: From a technical perspective, the telephonic equipment located in Bay State's Springfield Contact Center is capable of measuring and recording any of the above-listed performance measures. There would be a certain amount of time and expense incurred to set up the system and to adjust staffing levels accordingly, especially because the Company serves multiple jurisdictions under different performance measurements, but it is feasible. However, from a policy perspective, Bay State continues to struggle with the basis for mandating call center performance standards on anything other than historic performance. During all the years Bay State has been involved with service quality standards, it has never seen

any credible evidence directly indicating that customer's require and would be willing to pay the incremental costs associated with answering 75 percent of the incoming phone calls in 20 seconds regardless of whether they choose an automated option or a live operator. Further, it has been Bay State's understanding that the purpose of the Massachusetts' service quality standards is to maintain historic service quality levels, and mandating any of the above-described performance levels that are more stringent than Bay State's current benchmarks runs contrary to the Company's thinking.